

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

David Campbell, et al.,	:	
	:	
Plaintiffs,	:	Case No. 2:23-CV-3521
	:	
v.	:	Judge: Edmund A. Sargus
	:	Magistrate Judge: Kimberly A. Jolson
BrandSafway Services, et al.,	:	
	:	
Defendants.	:	

DEFENDANT FIRSTENERGY CORP'S RULE 26(a) INITIAL DISCLOSURES

Now comes Defendant FirstEnergy Corp., by and through counsel, and pursuant to Federal Rule of Civil Procedure 26(a), makes the following initial disclosures to Plaintiff, such disclosures being based upon information presently known and reasonably available to FirstEnergy Corp. FirstEnergy Corp. reserves the right to supplement this disclosure as discovery progresses.

I. Individuals Likely to Have Discoverable Information.

- A. Plaintiff David Campbell;
- B. Plaintiff Ruth Campbell;
- C. Representative of Brandsafway Services;
- D. Representative of Brandsafway Services LLC;
- E. Representative of Enerfab Power & Industrial Inc.;
- F. Representative of Energy Harbor, LLC;
- G. Witnesses to the subject accident;
- H. Plaintiff's medical care providers and their billing personnel; and
- I. Any witnesses identified by any other party.

FirstEnergy Corp. reserves the right to supplement this disclosure as discovery progresses.

II. Documents Defendant May Use to Support its Defenses.

- A. Any incident reports;
- B. Plaintiff's medical records and billing statements;
- C. Documents from Energy Harbor, LLC confirming that Energy Harbor, LLC, not FirstEnergy Corp., owned the property where Plaintiff's accident occurred when the accident occurred; and
- D. Any documents or evidence produced by any other party during discovery.

FirstEnergy Corp. reserves the right to supplement this disclosure as discovery progresses.

III. Computation of Damages Claims along with Documentation.

Not applicable.

IV. Insurance Agreements.

FirstEnergy Corp. is self-insured.

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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing *Defendant FirstEnergy Corp. 's Rule 26(a) Initial Disclosures* has been served via the Court's electronic filing system this 3rd day of January, 2023 upon:

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